Beechcraft | Cessna | Hawker

TEXTRON AVIATION

August 17, 2017

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: RM-11793

Dear Ms. Dortch:

Textron Aviation, Inc. ("Textron Aviation") hereby submits comments concerning the issues presented in the above-referenced proceeding.

Textron Aviation is the world's leading general aviation company, with brands including Beechcraft, Cessna and Hawker. Textron Aviation companies have delivered more than 250,000 aircraft, and currently employ more than 12,000 people worldwide -- including 11,000 in the United States -- with sales last year exceeding $4.9 billion. This success is directly related to our ability to successfully develop, test, certify, and manufacture new aircraft to meet the growing domestic and international demand for our products and services. Textron Aviation's business would be hurt significantly should our flight testing capabilities be compromised.

The development and certification of increasingly sophisticated aircraft require more parameters to be monitored, as well as increased sampling rates. Textron Aviation engineers the layout of each aircraft's data stream in order to minimize the bit rate and bandwidth needed to transmit the required data. Nevertheless, some of our current platforms require bit rates more than double that needed just a few years ago. When video is required in addition to the other parameters, the single-mission bandwidth requirements are even higher. The spectrum used for transmission of this data is shared among various Federal and non-Federal users, and the number of users and locations continues to grow. The allocation for Aeronautical Mobile Telemetry in the band 5091-5150 MHz at the World Radio Conference in 2007 was intended to help us accommodate this growth.

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The Federal Aviation Administration has long provided excellent spectrum coordination support to Textron Aviation. Our products rely on the systems and infrastructure that supports the safe operation of aircraft, and we support the implementation and primary status of AeroMACS in 5091-5150 MHz. However, as an AFTRCC member, Textron Aviation is keenly aware of cases where primary AMT spectrum designated as safety-of-life is successfully shared with secondary users. In those instances, the rules and coordination regimen have been developed based upon expert technical analysis, testing, and good faith negotiations.

AeroMACS-AMT compatibility tests conducted overseas by other manufacturers have produced positive results on techniques for compatible use of the band. However, tests should be conducted here in the U.S. to confirm these and other techniques. To this end, Textron Aviation supports such field testing by qualified experts before the Commission considers whether to proceed to a notice of proposed rulemaking. We are hopeful that the FAA and other interested parties will agree.

Sincerely,

Danny B. Hankins

Danny B. Hankins
Senior Spectrum Manager
Textron Aviation, Inc.

cc: Chairman Ajit Pai
: Commissioner Mignon Clyburn
: Commissioner Michael O'Rielly
: Commissioner Brendan Carr
: Commissioner Jessica Rosenworcel